

Fill in this information to identify the case

Debtor 1 Jeffrey E. Martin

Debtor 2 \_\_\_\_\_  
(Spouse, if filing)

United States Bankruptcy Court for the: MIDDLE District of PENNSYLVANIA  
(State)

Case number 20-01043

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

Name of creditor: PNC Bank, National Association

Court claim no. (if known):

Last 4 digits of any number you use to identify the debtor's account: 4609

17

Property address: 611 Prospect Ave

Number Street

Shippensburg PA 17257-8988

City

State

Zip Code

**Part 2: Prepetition Default Payments**

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

07/01/2025  
MM/DD/YYYY

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$ \_\_\_\_\_

b. Total fees, charges, expenses, escrow, and costs outstanding:

(b) \$ \_\_\_\_\_

c. Total. Add lines a and b.

(c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

      /      /        
MM/DD/YYYY

#### Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

#### Part 5: Sign Here

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box.

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this Notice is true and correct to the best of my knowledge, information, and reasonable belief.**

**X** /s/Stephen R. Franks Date 06/10/2025  
Signature

Print: Stephen R. Franks Title Attorneys for Creditor

Company MDK Legal

Address P.O. Box 165028  
Number Street

Columbus, OH 43216-5028  
City State ZIP Code

Contact phone 614-220-5611 Email amps@manleydeas.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	:	
	:	<b>Case No.: 20-01043</b>
<b>Jeffrey E. Martin</b>	:	<b>Chapter 13</b>
	:	<b>Judge Henry W. Van Eck</b>
<b>Debtor(s)</b>	:	<b>*****</b>
	:	<b>*</b>
	:	
<b>PNC Bank, National Association</b>	:	<b>Related Document #</b>
	:	
<b>Movant,</b>	:	
	:	
<b>vs</b>	:	
	:	
<b>Jeffrey E. Martin</b>	:	
<b>Jack N Zaharopoulos</b>	:	
	:	
<b>Respondents.</b>	:	
	:	

**CERTIFICATE OF SERVICE**

I certify that on the date of filing, a copy of the foregoing Response to Notice of Final Cure was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Jack N Zaharopoulos, Standing Chapter 13 (Trustee), info@pamd13trustee.com

Paul Donald Murphy-Ahles, Attorney for Jeffrey E. Martin, pmurphy@dplglaw.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Jeffrey E. Martin, 611 Prospect Avenue, Shippensburg, PA 17257

\_\_\_\_\_  
/s/Stephen R. Franks